

ORIGINAL

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

CRIM 331

- - - - - x

UNITED STATES OF AMERICA : INFORMATION

: 19 Cr. \_\_\_\_

- v. - :  
FAROOQ QAREN,  
a/k/a "Mike," :  
Defendant. :  
: x

- - - - - x

COUNT ONE**(Marriage Fraud Conspiracy)**

The United States Attorney charges:

1. From at least in or about March 2016 up to and including in or about March 2019, in the Southern District of New York and elsewhere, FAROOQ QAREN, a/k/a "Mike," the defendant, and others known and unknown, knowingly combined, conspired, confederated, and agreed together and with each other to commit an offense against the United States, to wit, a violation of Title 8, United States Code, Section 1325(c).

2. It was a part and object of the conspiracy that FAROOQ QAREN, a/k/a "Mike," the defendant, and others known and unknown, knowingly entered into a marriage for the

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purpose of evading provisions of the immigration laws.

**Overt Acts**

3. In furtherance of said conspiracy and to effect the illegal object thereof, the following overt acts, among others, were committed in the Southern District of New York and elsewhere:

a. In or about April 2016, FAROOQ QAREN, a/k/a "Mike," the defendant, paid approximately \$500 in cash to a co-conspirator not named as a defendant herein ("CC-1") in the Bronx, New York, in exchange for CC-1's agreement to marry a co-conspirator not named as a defendant herein ("CC-2") in order to enable CC-2 to obtain a visa to enter the United States.

b. On or about April 3, 2016, QAREN traveled to Djibouti City, Djibouti with CC-1 in order for CC-1 to marry CC-2.

c. In or about April 2016, after QAREN's and CC-1's return from Djibouti, QAREN paid an additional \$500 in cash to CC-1 in return for CC-1's marriage to CC-2.

(Title 18, United States Code, Section 371.)

**FORFEITURE ALLEGATION**

4. As a result of committing the offense alleged in Count One of this Information, FAROOQ QAREN, a/k/a "Mike," the defendant, shall forfeit to the United States, pursuant to Title 18, United States Code, Section 982(a)(6) and Title 28, United

States Code, Section 2461(c), any and all property, real and personal, that constitutes or is derived from proceeds traceable to the commission of said offense, including but not limited to a sum of money in United States currency representing the amount of proceeds traceable to the commission of said offense.

**Substitute Asset Provision**

5. If any of the above-described forfeitable property, as a result of any act or omission of the defendant:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or

e. has been commingled with other property which cannot be divided without difficulty; it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p) and Title 28, United States Code, Section 2461(c), to seek forfeiture of any other property of the defendant up to the value of the above-described forfeitable property.

(Title 18, United States Code, Section 982; Title 21, United States Code, Section 853; and Title 28, United States Code, Section 2461.)



GEOFFREY S. BERMAN  
United States Attorney

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(18 U.S.C. § 371.)

GEOFFREY S. BERMAN

United States Attorney